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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 SELF-INSURERS' SECURITY FUND, a
14 California Non-Profit Mutual Benefit
15 Corporation,

16 Plaintiff,

17 v.

18 GALLAGHER BASSETT SERVICES, INC., a
19 Delaware Corporation, and DOES ONE through
20 TEN,

21 Defendant.

Case No. C 06-02828 JSW (JCS)

Complaint Filed: March 27, 2006
Trial Date: October 22, 2007

**STIPULATION AND ~~PROPOSED~~
ORDER RE ACCESS OF PLAINTIFF
SELF-INSURERS' SECURITY FUND
TO DATABASE OF DEFENDANT
GALLAGHER BASSETT SERVICES**

22 Plaintiff Self-Insurers' Security Fund (the "Fund") and Defendant Gallagher
23 Bassett Services, Inc. ("Gallagher Bassett") stipulate as follows:

24 1. Pursuant to the Civil Minute Order entered in this action on June 6,
25 2007 (the "June 6, 2007 Order"), certain identified consultants of the Fund will be provided
26 access to the "RisxFacs" database maintained by Gallagher Bassett.

27 2. The Fund's identified consultants will be provided access to Gallagher
28 Bassett's RisxFacs database solely for the purpose of reviewing the claim notes of the 576

claimants identified in the Fund's Second Request For Production Of Documents, Attachment A, served on April 23, 2007. The Fund and its identified consultants understand, acknowledge and agree that the RisxFacs database contains proprietary and commercially sensitive information, and the parties stipulate that all information on RisxFacs that will be reviewed by the Fund's consultants is designated as "Confidential" under the terms of the Stipulated Protective Order in this action and is produced by Gallagher Bassett pursuant to the June 7, 2007 Order and the Court's Order Re April 20, 2007 Joint Letter entered on April 23, 2007.

4. The Fund's identified consultants will be provided access to Gallagher Bassett's RisxFacs database between 5:00 p.m. on June 8, 2007, or earlier at the sole discretion of Gallagher Bassett, and 5:00 p.m. of the date that the Fund's expert reports on the Section 17200 claim are due.

5. The Fund's identified consultants will be provided such access only after executing the Confidentiality Agreement, attached hereto as Exhibit A ("Confidentiality Agreement") and incorporated here by reference. The Fund and its identified consultants understand, acknowledge and agree that violation of the Confidentiality Agreement or this Stipulation and Order shall be punishable by any monetary or evidentiary sanction, or any other penalty, that the Court deems appropriate.

Dated: June 8, 2007

FOLGER LEVIN & KAHN LLP

/s/

Jiyun Cameron Lee
Attorneys for Plaintiff
Self-Insurers' Security Fund

Dated: June 8, 2007

BINGHAM MCCUTCHEN LLP

/s/

Robert A. Lewis
Attorneys for Defendant
Gallagher Bassett Services, Inc.

ORDER

Pursuant to stipulation, it is so ordered.

Dated: June 12, 2007


The Honorable Jeffrey S. White

EXHIBIT A
CONFIDENTIALITY AGREEMENT

I have read this Stipulation And Order Re Access Of Plaintiff Self-Insurers' Security Fund To Database Of Defendant Gallagher Bassett Services as well as the Stipulated Protective Order ("Protective Order") entered in this action and understand their contents.

I understand, acknowledge and agree that Gallagher Bassett's RisxFacs database to which I will be provided access sensitive, confidential and proprietary information, and I agree not to disclose the information to which I am provided access to anybody other than those individuals and entities set forth in the Protective Order, and that my access and use of this information shall be governed by the Protective Order.

I understand, acknowledge and agree that I will access and review while on the RisxFacs database information only the claim notes of the 576 claimants that are identified the Self-Insurers' Security Fund's Second Request For Production of Documents, Attachment A, served on April 23, 2007.

I understand, acknowledge and agree that any violation of this Confidentiality Agreement, the Stipulation And Order Re Access Of Plaintiff Self-Insurers' Security Fund To Database Of Defendant Gallagher Bassett Services, or the Protective Order shall be punishable by order of the Court, and may subject me, the Fund or both to sanctions of any kind that the Court deems appropriate.
